

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

RUTH M. CLAYTON

Plaintiff,

v.

WATTS WATER TECHNOLOGIES

Defendant.

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§

CIVIL ACTION NO. _____

INDEX OF STATE COURT FILE

| TAB | FILED | DOCUMENT |
|-------------|--------------|---|
| C-1 | 07/11/13 | Civil Case Information sheet |
| C-2 | 07/11/13 | Citation issued to Watts Water Technologies |
| C-3 | 07/11/13 | Plaintiff's Original Petition |
| C-4 | 07/11/13 | ABC Legal's correspondence to Dallas County District Clerk requesting citation be issued to Watts Water Technologies |
| C-5 | 07/22/13 | Notice of Initial Dismissal Hearing |
| C-6 | 07/22/13 | Notice of Initial Dismissal Hearing (duplicate copy) |
| C-7 | 07/22/13 | Notice of Initial Dismissal Hearing (duplicate copy) |
| C-8 | 09/26/13 | Return of Service (with Affidavit) for the service on Watts Water Technologies |
| C-9 | 10/04/13 | Defendant Watts Water Technologies, Inc's Original Answer |
| C-10 | 10/04/13 | Gina Viccinelli's correspondence to Dallas County District Clerk filing Defendant Watts Water Technologies, Inc's Original Answer |

EXHIBIT B

CASE SUMMARY

CASE No. DC-13-07666

RUTH CLAYTON
vs.
WATTS WATER TECHNOLOGIES

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§






Location: **193rd District Court**
Judicial Officer: **GINSBERG, CARL**
Filed on: **07/11/2013**

CASE INFORMATION

Case Type: **MOTOR VEHICLE
ACCIDENT**
Case Flags: **DISCOVERY LEVEL 1**

PARTY INFORMATION

| | | |
|------------------|---|--|
| PLAINTIFF | CLAYTON, RUTH M | <i>Lead Attorneys</i> HOOD, DONALD E <i>Retained</i> 214-691-7760(W) |
| DEFENDANT | WATTS WATER TECHNOLOGIES SERVING ITS PRESIDENT SRINIVAS K BAGPALLI 815 CHESTNUT DRIVE ESSEX COUNTY MASSACHUSETTS 01845 | VICCINELLI, GINA <i>Retained</i> 214-749-6544(W) |

| DATE | EVENTS & ORDERS OF THE COURT | INDEX |
|------------|---|--|
| 02/06/2007 | ORDER - LIMINE | Vol./Book 531L, Page 00118, 5 pages |
| 07/11/2013 |  ORIGINAL PETITION (OCA) | |
| 07/11/2013 |  ISSUE CITATION | |
| 07/11/2013 |  CASE FILING COVER SHEET | |
| 07/22/2013 |  NOTICE OF HEARING / FIAT DISMISSAL HEARING | |
| 10/04/2013 |  ORIGINAL ANSWER - GENERAL DENIAL Party: DEFENDANT WATTS WATER TECHNOLOGIES | |
| 10/07/2013 | SCHEDULING ORDER | Vol./Book 531L, Page 00119, 5 pages |
| 10/08/2013 | ORDER - MEDIATION | Vol./Book 531L, Page 00120, 5 pages |
| 10/31/2013 | CANCELED DISMISSAL FOR WANT OF PROSECUTION (1:30 PM) (Judicial Officer: GINSBERG, CARL) BY COURT ADMINISTRATOR INITIAL DISMISSAL | |
| 04/15/2014 | Non Jury Trial (9:30 AM) (Judicial Officer: GINSBERG, CARL) | |

DATE

FINANCIAL INFORMATION

| | |
|------------------------------------|-------------|
| PLAINTIFF CLAYTON, RUTH M | |
| Total Charges | 260.00 |
| Total Payments and Credits | 260.00 |
| Balance Due as of 10/9/2013 | 0.00 |

EXHIBIT C-1

CIVIL CASE INFORMATION SHEET

CAUSE NUMBER (FOR CLERK USE ONLY):

DC-13-07466

COURT (FOR CLERK USE ONLY):

STYLED Ruth Clayton vs. Watts Water Technologies

(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

| | | | | | | | | | |
|--|--|--|-------------------|---|--|--|--|---|--|
| 1. Contact information for person completing case information sheet: Name: _____ Email: <u>dan@dickmanlawoffices.com</u> Telephone: _____ Address: _____ 6440 N. Central Expwy Ste 200 City/State/Zip: _____ Dallas, TX 75206 Fax: _____ 214-691-7767 Signature: <u>Daniel J. Peters</u> State Bar No: _____ 24057719 | | Names of parties in case: Plaintiff(s)/Petitioner(s): <u>Ruth Clayton</u> Defendant(s)/Respondent(s): <u>Watts Water Technologies</u> [Attach additional page as necessary to list all parties] | | Person or entity completing sheet is: <input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other _____ Additional Parties in Child Support Case: Custodial Parent: _____ Non-Custodial Parent: _____ Presumed Father: _____ | | | | | |
| 2. Indicate case type, or identify the most important issue in the case (select only 1): | | | | | | | | | |
| Civil | | | Family Law | | | | | | |
| Contract <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: Foreclosure <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract: | | Injury or Damage <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation Malpractice <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: <input checked="" type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises Product Liability <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: _____ <input type="checkbox"/> Other Injury or Damage: | | Real Property <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: Related to Criminal Matters <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other: | | Marriage Relationship <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void Divorce <input type="checkbox"/> With Children <input type="checkbox"/> No Children Other Family Law <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: | | Post-judgment Actions (non-Title IV-D) <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other Title IV-D <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocity (UIFSA) <input type="checkbox"/> Support Order Parent-Child Relationship <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child: | |
| Employment <input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment: | | Other Civil <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other: | | | | | | | |
| Tax <input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax | | Probate & Mental Health Probate/Wills/Intestate Administration <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: | | | | | | | |
| 3. Indicate procedure or remedy, if applicable (may select more than 1): | | | | | | | | | |
| <input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action | | <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment | | <input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover | | | | | |
| 4. Indicate damages sought (do not select if it is a family law case): | | | | | | | | | |
| <input checked="" type="checkbox"/> Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees <input type="checkbox"/> Less than \$100,000 and non-monetary relief <input type="checkbox"/> Over \$100,000 but not more than \$200,000 <input type="checkbox"/> Over \$200,000 but not more than \$1,000,000 <input type="checkbox"/> Over \$1,000,000 | | | | | | | | | |

EXHIBIT C-2

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

To:

**WATTS WATER TECHNOLOGIES
SERVING ITS PRESIDENT SRINIVAS K BAGPALLI
815 CHESTNUT DRIVE ESSEX COUNTY MASSACHUSETTS 01845**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. Your answer should be addressed to the clerk of the **193rd District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **RUTH M CLAYTON**

Filed in said Court **11th day of July, 2013** against

WATTS WATER TECHNOLOGIES

For Suit, said suit being numbered **DC-13-07666**, the nature of which demand is as follows:
Suit on **MOTOR VEHICLE ACCIDENT** etc. as shown on said petition **REQUEST FOR DISCLOSURE**, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: GARY FITZSIMMONS, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 15th day of July, 2013.

ATTEST: GARY FITZSIMMONS, Clerk of the District Courts of Dallas, County, Texas



By Anita Freeneey, Deputy
ANITA FREENEY

ATTY

CITATION

DC-13-07666

**RUTH M CLAYTON
vs.**

WATTS WATER TECHNOLOGIES

**ISSUED THIS
15th day of July, 2013**

**GARY FITZSIMMONS
Clerk District Courts,
Dallas County, Texas**

By: ANITA FREENEY, Deputy

**Attorney for Plaintiff
DONALD E HOOD
SUITE 200
6440 N CENTRAL EXPRESSWAY
DALLAS TX 75206
214-691-7760**

**FEES
PAID**

**FEES NOT
PAID**

OFFICER'S RETURN

Case No. : DC-13-07666

Court No. 193rd District Court

Style: RUTH M CLAYTON

vs.

WATT'S WATER TECHNOLOGIES

Came to hand on the _____ day of _____, 20____, at _____ o'clock _____ M. Executed at _____
within the County of _____ at _____ o'clock _____ M. on the _____ day of _____,
20____ by delivering to the within named _____

each, in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by
me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

| | | | |
|----------------------|----------|----------|---------------|
| For serving Citation | \$ _____ | _____ | _____ |
| For mileage | \$ _____ | of _____ | County: _____ |
| For Notary | \$ _____ | By _____ | Deputy _____ |

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20____.

to certify which witness my hand and seal of office.

Notary Public _____ County _____

EXHIBIT C-3

ORIGINAL

No. DC-13-07466Ruth M Clayton
Plaintiff

vs.

Watts Water Technologies
Defendant§
§
§
§
§
§

IN THE DISTRICT COURT

JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

FILED
2013 JUL 11 AM 10:01
CLERK OF DISTRICT COURT
DALLAS COUNTY, TEXASPLAINTIFF'S ORIGINAL PETITION and REQUEST FOR DISCLOSURE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Ruth M Clayton (hereinafter "Plaintiff") complaining of Watts Water Technologies (hereinafter "Defendant") to this Court as follows:

I. DISCOVERY CONTROL PLAN

Plaintiff intends for discovery to be conducted under Level I of the Texas Rules of Civil Procedure.

II. PARTIES

Plaintiff is an individual and Texas resident. Defendant Watts Water Technologies is a foreign corporation duly formed and existing under the laws of the State of Massachusetts. Defendant has obtained a certificate of authority, is duly authorized to transact business in the State of Texas, and may be served with citation in this action by serving Srinivas K Bagpalli, president, at 815 Chestnut Drive, North Andover, Essex County, Massachusetts 01845.

III. FACTS & NEGLIGENCE

Defendant is engaged in the business of manufacturing plumbing and water delivery/supply parts. Sometime in 2004, the plaintiff purchased a hot water heater that had components which were manufactured by the defendant. This unit has a model number of S-202 and a serial number of 66113318.

On or about 01/26/2012, the hot water heater which was manufactured by the defendant had a manufacturing defect in a water heater connector hose which failed. Expert reports from professional engineer John E. Scates conducted on 3/22/2012, determined that the water heater hose failed due to a rupture within the inner tubing, which was due to insufficient selection of material from which the hose was comprised of. This insufficient tubing material allowed for the accumulation of particulate matter which compromised the structural integrity of the hose.

The poor workmanship in the manufacturing of the hot water heater components caused the unit to fail, which in turn caused a water leak and damages to the plaintiff's home. Plaintiff is informed and believes, and therefore alleges, that the water leak and damages caused thereby were a proximate result the poor workmanship of the defendant or the defendant's employee. As a result of the poor workmanship, Plaintiff's home has suffered substantial damages to his property in an amount within the jurisdictional limits of the court.

IV. REQUEST FOR DISCLOSURE

Pursuant to Rule 194 of the Texas Rules of Civil Procedure, you are requested to disclose, within 50 days of service of this request, the information or material described in Rule 194.2 of the Texas Rules of Civil Procedure.

FOR THE COURTS EYES ONLY: State Farm Lloyds would show that it is interested in the subject matter of this suit by reason of the fact that on or about the various dates of the losses alleged herein, and at all times material to this cause of action, it had in full force and effect a policy of insurance issued to Plaintiff and which policy was duly endorsed and provided for physical damage caused by water or other loss for the contents of Plaintiff's home for damages in excess of the deductible amount stated in the declarations thereto.

As a result of the negligence of Defendants, as described herein, State Farm Lloyds was called upon to pay and did pay the damages to the building and contents of the premise of Plaintiff's home in an amount within the jurisdictional limits of this court. State Farm Lloyds is subrogated under the terms of the policy all amounts paid over \$1,542.00.

IV. DAMAGES

As a result of the accident described herein Plaintiff's home and the contents thereof were damaged in the amount of \$119,308.19. Plaintiff affirmatively alleges a cause of action and prays for judgment against Defendant.

V. PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that upon legal trial or hearing of this cause judgment be rendered for Plaintiff as prayed for, and that Plaintiff be allowed to recover from Defendant \$119,308.19 for property damages; for pre-judgment interest from the date of the accident to the time of trial; for post-judgment interest as allowed by law; and for such other and further relief, both general and special, at law or in equity, to which Plaintiff may show itself justly entitled.

The undersigned certifies compliance with Rule 21 and Rule 21(a), Texas Rules of Civil Procedure on June 28, 2013.

Respectfully submitted,
DICKMAN LAW OFFICES, PLLC

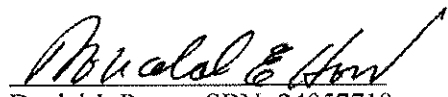

Daniel J. Peters, SBN: 24057719
Jessica R. Lobes, SBN: 24083405
Donald E. Hood, SBN: 09941040
Dale A. Dickman, SBN: 00793619
6440 North Central Expressway, Suite 200
Dallas, Texas 75206
Attorney for Plaintiff
Office: 214.691.7760/Fax: 214.691.7767

EXHIBIT C-4



7776192
In re: WATTS WATER TECHNOLOGIES
7776-192



633 Yesler Way, Seattle, WA 98104
Phone: 206-521-9000 Fax: 206-625-9247

ORIGINAL PETITION - CIVIL CASE
DISTRICT COURT

Clerk of the District Court
Dallas County, Texas
600 Commerce Street, 1st Floor - Suite 103
Dallas, TX 75202

DC 13-07666

193rd

RE: RUTH M CLAYTON vs. WATTS WATER TECHNOLOGIES; Clerk of the District Court of Dallas County, Texas

Dear Sir or Madam:

Enclosed please find the following documents:

- Cover letter
- Original Petition (Original plus copies)
- Firm Check(s) for

Instructions:

- Please file the Original Petition (Damages Sought:)
- Please issue a separate Citation for each defendant for service by a private process server.

The Citation(s) should be issued to:

WATTS WATER TECHNOLOGIES
815 CHESTNUT DR
NORTH ANDOVER, MA 01845

- Please return this coversheet, the original Citation, and a filed-stamped copy of the Original Petition to ABC Legal by:

- ☐ Mail, using the enclosed pre-addressed and pre-paid return envelope
- ☐ Holding for ABC Legal courier pick up

Thank you in advance for your assistance!

ABC Legal Services

**** Please do not throw me away ****
Return this page with the citation and petition
This barcode is very important to us



In re: WATTS WATER TECHNOLOGIES
7776-192

EXHIBIT C-5



DC-13-07666

RUTH CLAYTON
vs.
WATTS WATER TECHNOLOGIES

IN THE DISTRICT COURT
193RD JUDICIAL DISTRICT
DALLAS COUNTY TEXAS

NOTICE OF INITIAL DISMISSAL HEARING

Counsel or Pro Se Plaintiff:

This case is set for a hearing on the Initial Dismissal Docket, as per Tex. R. Civ. P. 165a, for **THURSDAY, OCTOBER 31, 2013**, at 1:30 p.m. in the 193rd District Court Courtroom.

1. If no Defendant has been served as evidenced by no return of citation having been filed with the court on or before the Dismissal Hearing, the case is subject to being dismissed at the Dismissal Hearing;
2. If service has been made on a Defendant, but no answer has been filed (and any such answer is past due before the Dismissal Hearing Date), you must obtain a default judgment on or before the Dismissal Hearing, or the case is subject to being dismissed at the Dismissal Hearing. You are encouraged to submit requests for default by submission with affidavit.
3. If service on at least one Defendant has been made and the citation has been returned to the Court before the Dismissal Hearing, but the time to file an answer has not yet expired, then the Dismissal Hearing is hereby reset for the Friday four weeks following the initial date of the Dismissal Hearing (*i.e.* the date listed above). (If this Friday falls on a holiday, the Dismissal Hearing is reset to the next Friday that is not a holiday.) No further dismissal notice will be sent, and you are expected to obtain a default judgment before the reset date of the Dismissal Hearing, or the case is subject to being dismissed.
4. If an answer is filed on or before the Dismissal Hearing, the case will be referred to the Court Coordinator to be set for trial, if not already set.

SIGNED this July 22, 2013

A handwritten signature in cursive script, appearing to read "Carl Ginsberg".

The Honorable Carl Ginsberg
193rd Judicial District Court

EXHIBIT C-6



DC-13-07666

**RUTH CLAYTON
vs.
WATTS WATER TECHNOLOGIES**

**IN THE DISTRICT COURT
193RD JUDICIAL DISTRICT
DALLAS COUNTY TEXAS**

NOTICE OF INITIAL DISMISSAL HEARING

Counsel or Pro Se Plaintiff:

This case is set for a hearing on the Initial Dismissal Docket, as per Tex. R. Civ. P. 165a, for **THURSDAY, OCTOBER 31, 2013**, at 1:30 p.m. in the 193rd District Court Courtroom.

1. If no Defendant has been served as evidenced by no return of citation having been filed with the court on or before the Dismissal Hearing, the case is subject to being dismissed at the Dismissal Hearing;
2. If service has been made on a Defendant, but no answer has been filed (and any such answer is past due before the Dismissal Hearing Date), you must obtain a default judgment on or before the Dismissal Hearing, or the case is subject to being dismissed at the Dismissal Hearing. You are encouraged to submit requests for default by submission with affidavit.
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4. If an answer is filed on or before the Dismissal Hearing, the case will be referred to the Court Coordinator to be set for trial, if not already set.

SIGNED this July 22, 2013

The Honorable Carl Ginsberg
193rd Judicial District Court

EXHIBIT C-7

DC-13-07666
NOT
NOTICE OF HEARING / FIAT
183708



DC-13-07666

RUTH CLAYTON
vs.
WATTS WATER TECHNOLOGIES

IN THE DISTRICT COURT
193RD JUDICIAL DISTRICT
DALLAS COUNTY TEXAS

NOTICE OF INITIAL DISMISSAL HEARING

Counsel or Pro Se Plaintiff:

This case is set for a hearing on the Initial Dismissal Docket, as per Tex. R. Civ. P. 165a, for **THURSDAY, OCTOBER 31, 2013**, at 1:30 p.m. in the 193rd District Court Courtroom.

1. If no Defendant has been served as evidenced by no return of citation having been filed with the court on or before the Dismissal Hearing, the case is subject to being dismissed at the Dismissal Hearing;
2. If service has been made on a Defendant, but no answer has been filed (and any such answer is past due before the Dismissal Hearing Date), you must obtain a default judgment on or before the Dismissal Hearing, or the case is subject to being dismissed at the Dismissal Hearing. You are encouraged to submit requests for default by submission with affidavit.
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4. If an answer is filed on or before the Dismissal Hearing, the case will be referred to the Court Coordinator to be set for trial, if not already set.

SIGNED this July 22, 2013

The Honorable Carl Ginsberg
193rd Judicial District Court

EXHIBIT C-8

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

To:

**WATTS WATER TECHNOLOGIES
SERVING ITS PRESIDENT SRINIVAS K BAGPALLI
815 CHESTNUT DRIVE ESSEX COUNTY MASSACHUSETTS 01845**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. Your answer should be addressed to the clerk of the 193rd District Court at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **RUTH M CLAYTON**

Filed in said Court **11th day of July, 2013** against

WATTS WATER TECHNOLOGIES

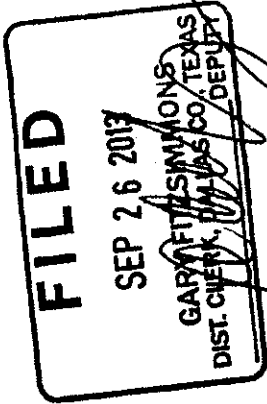
For Suit, said suit being numbered **DC-13-07666**, the nature of which demand is as follows:
Suit on **MOTOR VEHICLE ACCIDENT** etc. as shown on said petition **REQUEST FOR DISCLOSURE**, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: GARY FITZSIMMONS, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 15th day of July, 2013.

ATTEST: GARY FITZSIMMONS, Clerk of the District Courts of Dallas, County, Texas



By Anita Freeneey, Deputy
ANITA FREENEY



ATTY

CITATION

DC-13-07666

**RUTH M CLAYTON
vs.**

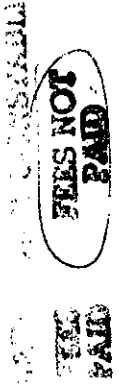
WATTS WATER TECHNOLOGIES

**ISSUED THIS
15th day of July, 2013**

**GARY FITZSIMMONS
Clerk District Courts,
Dallas County, Texas**

By: ANITA FREENEY, Deputy

**Attorney for Plaintiff
DONALD E HOOD
6440 N CENTRAL EXPRESSWAY
SUITE 200
DALLAS TX 75206
214-691-7760**



OFFICER'S RETURN

Case No. : DC-13-07666

Court No. 193rd District Court

Style: RUTH M CLAYTON

vs.

WATTS WATER TECHNOLOGIES

Came to hand on the _____ day of _____, 20____, at _____ o'clock _____ M. Executed at _____
 within the County of _____ day of _____
 20____, by delivering to the within named _____

 SEE ATTACHED
 DELETED

each, in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

| | | | |
|----------------------|----------|----------|---------------|
| For serving Citation | \$ _____ | _____ | _____ |
| For mileage | \$ _____ | _____ | County, _____ |
| For Notary | \$ _____ | By _____ | Deputy _____ |

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20____.

to certify which witness my hand and seal of office.

 Notary Public _____ County _____

IN THE 193RD DISTRICT COURT OF DALLAS COUNTY, TEXAS

RUTH M CLAYTON

Plaintiff/Petitioner

vs.

WATTS WATER TECHNOLOGIES

Defendant/Respondent

Hearing Date:

CASE NO:
DC-13-07666

AFFIDAVIT OF SERVICE OF:
PLAINTIFF'S ORIGINAL PETITION AND
REQUEST FOR DISCLOSURE; CITATION

The undersigned, being first duly sworn, on oath deposes and says: That s(he) is now and at all times herein mentioned was a citizen of the United States, over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, has the authority to serve pleadings in the State named below, and is competent to be a witness therein.

Documents came to hand on the 18th day of September, 2013, at 6:00 o'clock P.M.

On the 19th day of September, 2013, at the address of 155 FEDERAL Street STE 700, BOSTON, Suffolk County, MA 02110, USA; this affiant served the above described documents upon WATTS WATER TECHNOLOGIES by then and there personally delivering 1 true and correct copy (ies) thereof, by then presenting to and leaving the same with GAIL BROWN, CORPORATE OPERATIONS SPECIALIST FOR CT CORPORATION SYSTEMS, REGISTERED AGENT, A white female approx. 40-45 years of age 5'2"-5'4" in height weighing 160-180 lbs with brown hair.

No Information was provided or discovered that indicates that the subjects served are members of the U.S. military.

DATED this 19th day of September, 2013

[Signature]
Michael Noble, MA

Service Fee Total: \$85.00

SUBSCRIBED AND SWORN to before me this 19 day of September, 2013

Maria McIntire
NOTARY PUBLIC in and for the State of Massachusetts

Residing at: Boston, MA

My Commission Expires: Feb 1, 2019

FOR: Dickman Law Offices, P.C. ORIGINAL AFFIDAVIT OF
REF: 43-083L-207 SERVICE

Tracking #: 7776192 DAL FIL


 **MARIA MCINTIRE**
Notary Public
Commonwealth of Massachusetts
My Commission Expires
February 1, 2019

EXHIBIT C-9



CAUSE NO. DC-13-07666

RUTH M. CLAYTON

Plaintiff

vs.

WATTS WATER TECHNOLOGIES

Defendant

§
§
§
§
§
§
§
§
§

IN THE DISTRICT COURT

193rd JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

FILED
13 OCT 24 PM 3:12
DALLAS COUNTY CLERK
K. J. WATKINS
CLERK
DALLAS COUNTY, TEXAS

**WATTS WATER TECHNOLOGIES, INC.'S ANSWER TO
PLAINTIFF'S ORIGINAL PETITION**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Defendant Watts Water Technologies, Inc. (incorrectly named by Plaintiff as "Watts Water Technologies") and files this its Original Answer to Plaintiff's Original Petition and any amendments thereto, and in support thereof would show the Court the following:


I.
GENERAL DENIAL

Defendant generally denies each and every allegation contained in Plaintiff's Original Petition and any amendments thereto, pursuant to Tex. R. Civ. P. 92 and demand strict proof thereof.

WHEREFORE, PREMISES CONSIDERED, Defendant Watts Water Technologies, Inc. prays that Plaintiff recover nothing by way of its suit against Defendant. Defendant further prays that it recover all costs of Court incurred in the defense of this matter. Defendant further prays for such other and further relief, both at law and in equity, to which it may show itself justly entitled.

Respectfully submitted,

Hermes Sargent Bates, LLP

By: 
GINA VICCINELLI
State Bar No. 24013685

901 Main Street, Suite 5200
Dallas, Texas 75202
Telephone: 214.749.6000
Telecopier: 214.749.6100

Counsel for Watts Water Technologies, Inc.

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document was forwarded to counsel as follows: via facsimile on this 4th day of October, 2013:

Via Facsimile: 214-691-7767

Daniel J. Peters
Jessica R. Lobes
Donald E. Hood
Dale A. Dickman
Dickman Law Offices, PLLC
6440 North Central Expressway
Suite 200
Dallas, TX 75206

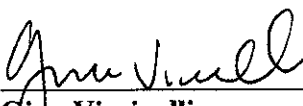

Gina Viccinelli
Counsel for Watts Water Technologies, Inc.

EXHIBIT C-10

HERMES SARGENT BATES

Minds over matters.™

LLP

FILED
13 OCT -4 PM 3:42
DALLAS COUNTY CLERK'S OFFICE

Gina Viccinelli
direct dial - 214.749.6544
direct fax - 214.749.6344
gina.viccinelli@hsblaw.com

October 4, 2013

Via Courier

Gary Fitzsimmons
Dallas County District Clerk
600 Commerce St., Suite 103
Dallas, TX 75202

RE: Cause No. DC-13-07666; *Ruth M. Clayton v v Watts Water Technologies*;
pending in the 193rd District Court, Dallas County, Texas.
Our File No. 674.189

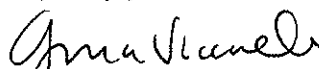
Dear Clerk:

Enclosed please find an original and one copy of *Defendant Watts Water Technologies, Inc.'s Original Answer to Plaintiff's Original Petition* in regard to the above-referenced matter. Please file the original and return a file-stamped copy to the courier delivering same.

By copy of this letter, all counsel of record is being provided with a true and correct copy of the enclosed pleading.

Thank you for your assistance. Should you have any questions, please do not hesitate to contact me.

Very truly yours,


Gina Viccinelli

GV/kdt
Enclosures

cc: (w/enclosure)
Via facsimile: 214-691-7767
Daniel J. Peters / Jessica R. Lobes
Donald E. Hood / Dale A. Dickman
Dickman Law Offices, PLLC
6440 North Central Expressway
Suite 200
Dallas, TX 75206